

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

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AD HOC COMMITTEE OF NON-US  
CUSTOMERS OF FTX.COM,

Plaintiffs,

v.

FTX TRADING, LTD., *et al.*

Defendants.

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Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Pro. No. 22-50514 (JTD)

**Ref. Nos. 1, 4 & 8**

**CERTIFICATION OF COUNSEL**

I, Matthew R. Pierce, counsel to the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On December 28, 2022, the Ad Hoc Committee of Non-US Customers of FTX.com (the “Plaintiffs” or the “Ad Hoc Committee”) filed the *Complaint for Declaratory Judgment* (the “Complaint”) [Adv. D.I. 1] in the above-captioned adversary proceeding against FTX Trading Ltd., *et al.*<sup>2</sup>, (collectively, the “Debtor Defendants” and together with the Plaintiffs, the “Parties”).

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> The Complaint names each of the Debtors in these Chapter 11 Cases as a Defendant. A list of the Debtor-Defendants subject to the Complaint is attached as Exhibit A to the Complaint.

2. On December 29, 2022, the Plaintiffs served a copy of the Complaint on the Debtor Defendants.

3. On January 31, 2023, the Parties entered into the *Stipulation Extending Time to Respond to the Complaint* [Adv. D.I. 4], whereby the Parties agreed to extend the Debtor Defendants' deadline to answer, move or otherwise respond to the Complaint to February 10, 2023.

4. On February 10, 2023, the Debtor Defendants filed the *Motion of Debtors for Entry of an Order Extending Time to Respond to the Complaint* [Adv. D.I. 6].

5. On March 1, 2023, the Court entered an order [Adv. D.I. 8] under certification of counsel further extending the deadline to answer, move or otherwise respond to the Complaint to April 14, 2023 (the "Response Deadline").

6. The Parties have conferred and agree that the Debtor Defendants' Response Deadline shall be further extended to April 21, 2023.

7. The Parties' stipulation is attached as **Exhibit A** to the proposed form of order approving the stipulation, which is annexed hereto as **Exhibit 1** (the "Order").

8. Accordingly, the Parties respectfully request that the Bankruptcy Court enter the Order at its earliest convenience.

Dated: April 14, 2023  
Wilmington, Delaware

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